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May 30, 2023

VIA ECF

Hon. Joan M. Azrack, U.S.D.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Agudelo v. Recovco Mortgage Management LLC, et al.*
E.D.N.Y. Case No. 22-cv-04004

Dear Judge Azrack:

As counsel for Defendants, we write in furtherance of the Court's directive on May 19, 2023 to file the motion for preliminary approval and related pleadings in the above-referenced matter by on or before May 30, 2023. Defendants request an extension of the parties' time to file the motion for preliminary approval and related pleadings to on or before June 1, 2023. As the Court is aware, the principal corporate Defendant ceased operations in mid-2022. It has limited ability to address the significant complex issues pertaining to a resolution of four class actions involving its entire workforce. The settlement pleadings are nearing completion, but further unanticipated changes are necessary. Class counsel have advised that they do not oppose this extension. The requested extension will not impact the parties' agreed-upon deadline for Defendants to begin funding the settlement. We thank the Court for its attention to this matter.

Respectfully submitted,

JACKSON LEWIS P.C.

/s/ *Marc S. Wenger*

Marc S. Wenger

MSW

cc: All Counsel of Record